

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

ANDREW KAYACHITH (17),

DEFENDANT.

Case No. 3:10-00260  
JUDGE HAYNES

**MOTION TO RECONSIDER RULING REGARDING EXCLUSION OF  
WITNESSES TESTIFYING ABOUT ARRESTS AND TRAFFIC STOPS OF  
DEFENDANTS TO PROVE ASSOCIATION**

Comes now the Defendant, ANDREW KAYACHITH (17), by and through his appointed counsel, and respectfully moves this Honorable Court to reconsider its previous ruling allowing the Government to present witnesses to testify about arrests and traffic stops unrelated to sex trafficking in order to prove association in a sex trafficking venture. This motion is made in accordance with Federal Rules of Evidence, 401, 402, 403, and 404(b). In support of said motion, Mr. Kayachith states as follows:

1. The Government today called two witnesses to testify that at certain times they conducted traffic stops of certain defendants who are alleged to be co-conspirators in this case. After the first witness testified, the undersigned counsel lodged a contemporaneous objection to the testimony of any other Government witnesses who would be called for the same purpose. This Honorable Court at that time overruled the objection.

*On the  
For the  
witnesses should  
in open court  
true nature  
is protected  
and the  
witnesses  
on the  
Government's  
Hall  
404(b)  
just one  
is excluded  
Shelly  
4/19/12*